

REMARKS

Claims 1-5, 15, 16, 45, and 48-51 are all the claims pending in the application. Claims 1 and 48-51 are amended herein. This Amendment, submitted in reply to the Office Action dated August 5, 2008, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claim Objections

The Examiner has objected to claim 51 based on certain informalities. Claim 51 is amended herein to address these informalities, and Applicant respectfully submits that all of the Examiner's concern has been fully addressed. Therefore, Applicant respectfully requests that this rejection be withdrawn.

Claim Rejections-35 U.S.C. §103(a)

Claims 1-3, 15, 45, and 48-51

Claims 1-3, 15, 45, and 48-51 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Snaper et al., (U.S. 4,140,370; henceforth "Snaper") in view of Takahashi et al. (U.S. 4,921,330; henceforth "Takahashi"). Applicant respectfully traverses this rejection.

Claim 1 recites, in part:

An image display device, comprising:

 a display panel...said display panel comprising an image surface on which the plurality of pixels are displayed;

 ...wherein the adhesive layer affixes the optical unit directly on the image surface of the display panel such that a positional relationship between the optical unit and the display panel is maintained while permitting a difference in expansion or contraction between the optical unit and the display panel so as to permit displacement of the optical unit due to expansion and contraction of a material of the optical unit.

As is plainly recited, an apparatus consistent with claim 1 has a display panel and an optical unit, wherein the optical unit is affixed directly on the image surface of the display panel.

In rejecting claim 1, the Examiner asserts that the optical screen 66 and peripheral mask 68 described in the Snaper reference correspond in combination to the recited optical unit. However, as described on lines 9-12 of column 4, lines 44-47 of column 4, and lines 28-33 of column 7 of the Snaper reference, reference numeral 66 denotes a planar optical screen, reference numeral 68 denotes an attached peripheral mask, and reference numeral 70 denotes a periphery of the peripheral mask. Further, lines 31-33 of column 7 of Snaper recite "a double sided adhesive strip located on the periphery 70 of the mask **so as to contact the frame or case of the television set.**"

As described above, Snaper clearly states that a double sided adhesive strip is provided on the **periphery 70 of the mask**. As shown in FIG. 14, the frame part of a television receiver facing the mask 68 is recessed toward the CRT (display) part, so that when the adhesive strip is provided on part of the mask, the optical unit does not adhere to the television screen. Accordingly, as Applicant has previously asserted, in Snaper the optical unit formed of the screen 66 and the mask 68 is fixed **not to the display (CRT) of the television receiver but to the frame or case thereof**. Conversely, claim 1 requires that the optical unit be affixed directly on the image surface of the display panel.

As Applicant has previously argued, when an optical unit is adhered to a frame or case of a television receiver, like in Snaper, there is not a large difference in the thermal expansion coefficient between the optical unit and the frame or case because the frame or case is formed of plastic. However, when an optical unit is directly adhered to an image surface of the display

panel, as claimed, there is a large difference in the thermal expansion coefficient, and stress is generated, creating problems such as peeling of the adhesive layer and damage to the display. The structure recited in claim 1 overcomes this problem by fixing the optical unit to a **part** of the display.

Further, in rejecting claim 1, the Examiner also asserts that the lenticular lens plate 3 in the Takahashi reference corresponds to the optical unit, and the Fresnel lens plate 2 corresponds to the display panel. However, in Takahashi, the Fresnel lens plate 2 and the lenticular lens plate 3 are fixed together in a laminated structure, forming a composite screen, and this composite screen is fixed to a cabinet. The Fresnel lens plate 2 is not a display panel having pixels and does not have an image surface on which the plurality of pixels are displayed as claimed. Therefore, Takahashi does not cure the above discussed deficiencies.

Further, in the cited Takahashi reference, there is no requirement that the display panel be aligned with the lens, and there is no teaching or suggestion relating to alignment of the display panel and the lens. Further, as the structure of Snapper does not suffer the problems described above, Applicant respectfully submits that one of ordinary skill in the art would not be motivated to seek out a solution, and would not look to Takahashi for any teachings. Therefore, Applicant respectfully submits that there is no motivation to combine the Snapper and Takahashi references.

Moreover, even if the Snapper and Takahashi references were combined as the Examiner has suggested, the combination would not have the configuration recited in claim 1 because of the differences between claim 1 and the cited references discussed above. Therefore, Applicant respectfully submits that claim 1 is patentable over the combination of Snapper and Takahashi for at least these reasons. Further, to the extent that claims 48-51 recite features similar to claim

I, Applicant respectfully submits that claims 48-51 are patentable for analogous reasons. Further, Applicant respectfully submits that all claims dependant from claim 1 are patentable at least by virtue of their dependencies. Therefore, Applicant respectfully requests that these rejections be withdrawn.

Claims 4, 5, and 16

Claims 4, 5, and 16 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Snaper in view of Eichenlaub (U.S. 5,410,345). Applicant respectfully traverses this rejection.

Claims 4, 5, and 16 depend from claim 1, which has been shown above to be patentable over the Snaper reference. Further, in the Office action, **the Examiner acknowledges that Snaper alone does not teach all of the features of claim 1.** Further, Eichenlaub does not cure the deficiencies of the Snaper Reference. Therefore, Applicant respectfully submits that these claims are patentable at least by virtue of their dependency upon claim 1 and respectfully requests that the rejection of these claims be withdrawn.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.114(c)
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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880 via EFS payment screen. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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